



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

FEB 17 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Neal Flyg
Plant Manager
ConAgra Foods Lamb Weston, Inc.
78153 Westland Road
Hermiston, Oregon 97838

Re: Risk Management Program Compliance Inspection
ConAgra Foods Lamb Weston, Inc.
EPA Facility ID Number 1000 0002 7384

Dear Mr. Flyg:

On April 1, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the ConAgra Foods Lamb Weston, Inc., (ConAgra) facility located at 78153 Westland Road, Hermiston, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Process Safety Information:** ConAgra failed to document that the process equipment for Engine Room 1 refrigeration system complied with recognized and generally accepted good engineering practices as required by 40 C.F.R. § 68.65(d)(2).

In addition, there are several areas of concern that were observed by the EPA inspectors during the inspection that you are required as an owner and operator to comply with the General Duty Clause (GDC) of Section 112(r)(1). These concerns are related to the processes not covered by your RMP such as Engine Rooms 2, 4 and 5 that should be documented pertaining to the process safety information on the design of the equipment.

1. Engine Room 2: ConAgra needs to document the safe upper and lower limits for such items as temperatures, pressures, flows, or compositions; an evaluation of the consequences of deviation; electrical classification; and that the refrigeration system complies with recognized and generally accepted good engineering practices.
2. Engine Room 4: ConAgra needs to document the safe upper and lower limits for such items as temperatures, pressures, flows, or compositions; an evaluation of the consequences of deviation; and

that the refrigeration system complies with recognized and generally accepted good engineering practices.

3. Engine Room 5: ConAgra needs to document the electrical classification; relief system design and design basis; that the refrigeration system complies with recognized and generally accepted good engineering practices; safe upper and lower limits for such items as temperatures, pressures, flows, or compositions of the equipment; and an evaluation of the consequences of deviation.

Please provide the documentation to substantiate that the area of concern of the covered process (Engine Room 1) listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101
Fax: (206) 553-1762

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,



for
Kelly McFadden, Manager
Pesticides and Toxics Unit